

THE PORT AUTHORITY OF NY & NJ

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July 28, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

The Port Authority of New York and New Jersey supports the comments filed by the International Bridge, Tunnel and Turnpike Association (IBTTA), representing over 300 toll facilities worldwide, opposing the Notice of Proposed Rulemaking (NPRM) Docket 93-61. Please note that the Port Authority is an existing operator of electronic toll collection systems at the Lincoln Tunnel and Kennedy Airport and has submitted comments to the FCC from this perspective. In addition, the Port Authority is a member of the E-ZPass Interagency Group

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Ms. Searcy

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For toll authorities planning to install and operate ETTM systems in the near future, they would experience implementation delays, greater risks and increased costs with such limited frequency availability.

Enclosed, for your convenience, is a copy of IBTTA's Executive Summary highlighting its opposition to the NPRM.

Thank you for your consideration.

Executive Summary

Statement of the International Bridge, Tunnel and Turnpike Association

Amendment of Section 90.239 - Federal Communications
Commission's Rules to Adopt Permanent Regulations for
Automatic Monitoring Systems: RM-8013; PR Docket No. 93-61;
FCC No. 93-141.

Background

The International Bridge, Tunnel and Turnpike Association (IBTTA) is the not-for-profit trade association representing the worldwide toll industry. Our members operate more than 300 toll facilities in 23 countries. These toll roads, bridges and tunnels carry more than seven billion vehicles each year.

IBTTA supports toll financing as an effective alternative or supplement to taxes and other revenues to finance the design, construction, operation and maintenance of transportation facilities. Enactment of the Intermodal Surface Transportation Assistance Act of 1991 (ISTEA) and the Clean Air Act Amendments of 1990 recognize the important contributions toll financing and highway technology make to national mobility, productivity and clean air goals. Toll agencies require adequate spectrum to achieve these important objectives.

Explanation of NPRM

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ETTM Definition

Recent technological advances allow the toll industry to collect tolls electronically in the accurate, efficient and cost-effective manner desired by the motoring public. Using ETTM systems, motorists can pay tolls in a hands-free

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In another effort, seven toll authorities in the Northeast are participating in an Interagency Group to select a compatible ETTM system for use by motorists throughout the New York, New Jersey and Pennsylvania region. This region accounts for nearly 40 percent of all toll transactions and

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Granting this NPRM would jeopardize toll agencies that currently use ETM applications successfully throughout the United States. It would also seriously hamper those agencies planning to use ETM in the future. Highway officials could lose the ability to use proven technology to